

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
Pro Se Non-Prisoner Complaint Form

RECEIVED
USDC CLERK, CHARLESTON, SC

2013 APR 15 A 10:10

[Enter the full name of the plaintiff in this action]

Tessa Rani Raybourne
Gibson Carlisle Childress

v.

[Enter the full name of each defendant in this
action. If possible, please list only one defendant
per line.]

① The Charleston County
Sheriff's Office
② Inspector Dana E.
Herron
③ The Charleston County
Sheriff's Office
Internal Affairs
office of Professional
Standards

Civil Action No.

(to be assigned by Clerk)

2:13-cv-1008-SB-BM

If allowed by statute, do you wish to have a trial by jury? Yes X No _____

[If any answer requires additional space, please use additional paper and attach hereto.]

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes _____ No X

B. If your answer to A is Yes, describe the lawsuit in the space below. [If more than one lawsuit, describe on another sheet of paper using the same outline.]

1. Parties to this previous lawsuit:

Plaintiff: _____

Defendant(s): _____

2. Court: _____

(If federal court, name the district; if state court, name the county)

3. Docket Number: _____

4. Name(s) of Judge(s) to whom case was assigned: _____

5. Status of Case: _____
(For example, was the case dismissed? Settled? Appealed? Still Pending?)

6. Date lawsuit was filed: _____

7. Date of disposition (if concluded): _____

C. Do you have any other lawsuit(s) pending in the federal court in South Carolina?

Yes _____ No _____

II. PARTIES

In Item A below, place your name and address in the space provided. [If additional plaintiffs, do the same on another sheet of paper.]

A. Name of Plaintiff: Tessa Rani Raybourne Gibson Carlisle Childress
Address: 867 S. Colony Dr. Bldg. F Unit 86 Charleston SC 29407

In Item B below, place the full name of the defendant, and his/her/its address, in the space provided. Use Item C for additional defendants, if any.

B. Name of Defendant: The Charleston County Sheriff's Office, et al.
Address: 3505 Pinehaven Drive Charleston Heights, SC 29405-7789

C. Additional Defendants (provide the same information for each defendant as listed in Item B above):

Inspector Dana E. Herron AND
Internal Affairs in the Office of
Professional Standards of The
Charleston County Sheriff's Office
3505 Pinehaven Drive Charleston, S.C.
29405-7789 - Inspector Herron scheduled
a meeting on February 28, 2013 and she
contacted my the next week telling an internal
investigation had begun.

III. STATEMENT OF CLAIM

State here, as briefly as possible, the facts of your case. Describe how each defendant is involved.

Include also the name(s) of other persons involved, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets of paper if necessary.

During several phone calls to me Insp. Dana E. Herron secretly recorded the telephone conversations between herself and me. On one occasion I asked Inspector Herron if she was recording me and the phone call and she answered with "yes", she said she records all of her ~~xx~~ phone calls.

I told her she did not have consent from me. Inspector Herron asked me how it would have changed anything. I told her my voice is a gift from God and I use it when I want and how I want.

I called the Federal Bureau of Investigation. Neil Ulrich called me on 4/11/2013, he said he will not investigate Inspector Dana E. Herron and gave his interpretation of Federal Law 18 U.S.C. § 2511 as allowing the recording that Inspector Dana E. Herron has decided to do to me during her Internal Investigation of Assault and Battery with intent to injure or kill by employees of the Charleston County Detention Center in North Charleston, S.C.

III. STATEMENT OF CLAIM - *continued.*

South Carolina Code 15-78-70

Liability for act of government employee; requirement that agency or political subdivision be named party defendant; effect of judgment or settlement

South Carolina Code(s) 17-30-10;

17-30-15; 17-30-20; 17-30-25;

17-30-30; 17-30-40; 17-30-45;

17-30-50; 17-30-55; 17-30-60;

17-30-65; 17-30-70; 17-30-75;

17-30-80; 17-30-85; 17-30-90; 17-30-95;

17-30-100; 17-30-105; 17-30-110;

17-30-115; 17-30-120; 17-30-125;

17-30-130; 17-30-135; 17-30-140; 17-30-145

Major Paul A. Grant: Investigative Services
South Carolina Law Enforcement Division
P.O. Box 21398 Columbia, South Carolina
29221-1398 - sent two(2) letters
to The Charleston County Sheriff's Office
that I sent certified mail to S.C. S.L.E.D.
requesting that a criminal investigation
begin pursuing criminal charges for
Assault and Battery with Intent against
the Charleston County Detention Center
and employees that work at
3841 Leeds Avenue Charleston, South Carolina
29405

IV. RELIEF.

State briefly and exactly what you want this court to do for you.

Bring charges and convict the violators of the law. Compensate me, the victim, for past, present, and future injuries monetarily for the full amount of \$300,000.00 three hundred thousand United States dollars.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 15 day of April, 2013.

12000 RRG Childers
Signature of Plaintiff

IV. RELEIF.

accumulative damages, tangible damages, actual damages, real damages
expectation damages, cosmetic damages, direct damages, general damages
compensatory damages, consequential damages, indirect damages
nominal damages (if needed), contemptuous damages (if needed)
additional damages, future damages, gross damages
hedonic damages, imaginary damages, inadequate damages
incidental damages, discretionary damages, damages ultra
damages for lost expectations, exemplary damages, enhanced damages
treble damages, putative damages, reliance damages
substantial damages, unliquidated damages, uncertain damages
temperate damages, stipulated damages, special damages
proximate damages, prospective damages, permanent damages
presumptive damages, pecuniary damages, particular damages
nonpecuniary damages, multiple damages, moratory damages
liquidated damages, lawful damages, irreparable damages
intervening damages, gross damages, reliance-loss damages